

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	:	
	:	
In re	:	Chapter 11 Case No.
	:	
MOTORS LIQUIDATION COMPANY, et al.,	:	09-50026 (REG)
f/k/a General Motors Corp., et al.	:	
	:	
Debtors.	:	(Jointly Administered)
	:	
-----X		

**NOTICE OF PRESENTMENT OF PROPOSED
ORDER DISALLOWING AND EXPUNGING CERTAIN
503(b)(9) CLAIMS PURSUANT TO 11 U.S.C. §§ 105(a) AND 503(b)(9)**

PLEASE TAKE NOTICE that Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”), will present the attached proposed order (the “**Proposed Order**”) pursuant to sections 105(a) and 503(b)(9) of title 11, United States Code (the “**Bankruptcy Code**”) disallowing and expunging certain claims filed pursuant to section 503(b)(9) of the Bankruptcy Code, to the Honorable Robert E. Gerber, United States Bankruptcy Judge, for signature on **February 18, 2011 at 12:00 noon.**

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Proposed Order must be made in writing and received in the Bankruptcy Judge’s chambers and by the

undersigned not later than **11:30 a.m. on February 18, 2011**. Unless objections are received by that time, the Proposed Order may be signed.

Dated: New York, New York
February 4, 2011

/s/ Joseph H. Smolinsky

Harvey R. Miller
Stephen Karotkin
Joseph H. Smolinsky

WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, New York 10153
Telephone: (212) 310-8000
Facsimile: (212) 310-8007

Attorneys for Debtors
and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X	
	:
In re	: Chapter 11 Case No.
	:
MOTORS LIQUIDATION COMPANY, et al.,	: 09-50026 (REG)
f/k/a General Motors Corp., et al.	:
	:
Debtors.	: (Jointly Administered)
	:
-----X	

**ORDER PURSUANT TO 11 U.S.C. §§ 105(a) AND 503(b)(9)
DISALLOWING AND EXPUNGING CERTAIN 503(b)(9) CLAIMS**

WHEREAS on June 1, 2009 (the “**Commencement Date**”), Motors Liquidation Company and its affiliated Debtors (collectively, the “**Debtors**”) filed the Motion of Debtors for Entry of Order Pursuant to 11 U.S.C. §§ 105(a) and 503(b)(9) Establishing Procedures for the Assertion, Resolution, and Satisfaction of Claims Asserted Pursuant to 11 U.S.C. § 503(b)(9) (ECF No. 51) requesting that this Court establish procedures (the “**503(b)(9) Procedures**”) to govern the resolution of certain claims (the “**503(b)(9) Claims**”) asserted against the Debtors pursuant to section 503(b)(9) of title 11, United States Code (the “**Bankruptcy Code**”);

WHEREAS on the Commencement Date, this Court entered that certain Order Pursuant to 11 U.S.C. Sections 105(a) and 503(b)(9) Establishing Procedures for the Assertion, Resolution, and Satisfaction of Claims Asserted Pursuant to 11 U.S.C Section 503(b)(9) (ECF No. 166) (the “**503(b)(9) Order**”) approving the 503(b)(9) Procedures;

WHEREAS in accordance with the 503(b)(9) Procedures and the 503(b)(9) Order, on October 9, 2009, the Debtors filed the *Debtors’ Objection to Certain 503(b)(9) Claims Under the Order Pursuant to 11 U.S.C. §§ 105(a) and 503(b)(9) Establishing Procedures for the*

Assertion, Resolution, and Satisfaction of Claims Asserted Pursuant to 11 U.S.C. § 503(b)(9)
(ECF No. 4312) (the “**503(b)(9) Objection**”), objecting to and seeking to invalidate certain
503(b)(9) Claims, as more fully described in the 503(b)(9) Objection;

WHEREAS in accordance with the 503(b)(9) Procedures and the 503(b)(9)
Order, any claimant who filed a 503(b)(9) Claim against the Debtors whose claim was objected
to by the Debtors pursuant to the 503(b)(9) Objection was required to file a response to the
503(b)(9) Objection by no later than twenty (20) days following October 29, 2009 (the
“**Objection Deadline**”) in order to preserve such claim;

WHEREAS the claimants listed on **Exhibit “A”** annexed hereto did not file a
response to the 503(b)(9) Objection in respect of their 503(b)(9) Claims by the Objection
Deadline;

WHEREAS pursuant to the 503(b)(9) Procedures and as contemplated by the
503(b)(9) Order, the Debtors are entitled to disallow and expunge the 503(b)(9) Claims listed on
Exhibit “A” hereto and the Debtors seek entry of this Order to allow their claims agent to adjust
the claims register accordingly;

WHEREAS due and proper notice of the presentment of this Order has been
provided, and it appearing that no other or further notice need be provided;

NOW, after due deliberation and sufficient cause appearing therfor, it is

ORDERED that, pursuant to sections 105(a) and 503(b)(9) of the Bankruptcy
Code and the 503(b)(9) Order, the claims listed on **Exhibit “A”** hereto are hereby disallowed
and expunged; and it is further

ORDERED that the official claims agent appointed in these cases is hereby authorized to strike the claims listed on **Exhibit “A”** hereto from the claims register; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object on any basis are expressly reserved with respect to, any claim that is not disallowed or expunged pursuant to this Order; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: New York, New York
_____, 2011

United States Bankruptcy Judge

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds for Objection	Objection Page Reference
IROQUOIS INDUSTRIES INC C/O PETER J TRANCHIDA ESQ 8150 OLD 13 MILE ROAD STE 110 WARREN, MI 48093	676	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$0.00 (P) \$203,571.21 (U) \$203,571.21 (T)	As set forth in 503(b)(9) Objection filed on October 29, 2009 (EFC No. 4312)	Pgs. 1-5
PHILADELPHIA NEWSPAPERS LLC C/O MORRIS & ADELMAN PC PO BOX 30477 PHILADELPHIA, PA 19103	537	Motors Liquidation Company	\$0.00 (S) \$75,387.31 (A) \$0.00 (P) \$0.00 (U) \$75,387.31 (T)	As set forth in 503(b)(9) Objection filed on October 29, 2009 (EFC No. 4312)	Pgs. 1-5
SATTERLUND SUPPLY COMPANY J CHRISTOPHER CALDWELL ESQUIRE STARK REAGAN 1111 W LONG LAKE RD STE 202 TROY, MI 48098	6026	Motors Liquidation Company	\$0.00 (S) \$2,590.11 (A) \$0.00 (P) \$0.00 (U) \$2,590.11 (T)	As set forth in 503(b)(9) Objection filed on October 29, 2009 (EFC No. 4312)	Pgs. 1-5
SCHRADER ELECTRONICS 11 TECHNOLOGY PARK BELFAST ROAD ANTRIM BT41 1QS, NORTHERN IRELAND IRELAND	1245	Motors Liquidation Company	\$0.00 (S) \$37,343.42 (A) \$0.00 (P) \$0.00 (U) \$37,343.42 (T)	As set forth in 503(b)(9) Objection filed on October 29, 2009 (EFC No. 4312)	Pgs. 1-5
UNITED STATES STEEL CORPORATION ATTN: GREGG SCHMIDT 600 GRANT STREET ROOM 1344 PITTSBURGH, PA 15219	202	Motors Liquidation Company	\$0.00 (S) \$0.00 (A) \$7,398,958.77 (P) \$29,752.33 (U) \$7,428,711.10 (T)	As set forth in 503(b)(9) Objection filed on October 29, 2009 (EFC No. 4312)	Pgs. 1-5

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.

Name and Address of Claimant	Claim #	Debtor	Claim Amount and Priority (1)	Grounds for Objection	Objection Page Reference
	5		\$0.00 (S)		
			\$115,320.84 (A)		
			\$7,398,958.77 (P)		
			\$233,323.54 (U)		
			\$7,747,603.15 (T)		

(1) In the "Claim Amount and Priority" column, (S) = secured claim, (A) = administrative expense claim, (P) = priority claim, (U) = unsecured claim and (T) = total claim. The amounts listed are taken directly from the proofs of claim, and thus replicate any mathematical errors on the proofs of claim. Where the claim amount is zero, unliquidated, unidentified, or otherwise cannot be determined, the amount listed is "0.00".

(2) Claims on the exhibit are sorted in alphabetical order based on the creditor name as listed on proof of claim form.